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November 12, 2002

## **BY ELECTRONIC MAIL**

Mary L. Cottrell, Secretary  
Department of Telecommunications & Energy  
Commonwealth of Massachusetts  
One South Station, 2<sup>nd</sup> Floor  
Boston, Massachusetts 02110

Re: Complaint of WorldCom Technologies, Inc. Against New England Telephone and  
Telegraph d/b/a Bell Atlantic-Massachusetts, Docket No. 97-116-G

Dear Ms. Cottrell:

RCN-BecoCom, L.L.C. ("RCN"), by counsel, submits this response in lieu of initial comments in this proceeding. RCN's motion to intervene in this proceeding was granted on January 27, 1998.

RCN agrees with the positions taken by MCI WorldCom Communications, Inc. in its Opening Brief on Remand. In particular, RCN agrees that the Department should affirm its October 21, 1998 Order that required Verizon to pay reciprocal compensation for traffic to Internet service providers under the terms of the interconnection agreement between Verizon and MFS Intelenet of Massachusetts, Inc.

Please do not hesitate to contact me with any questions.

Sincerely,

Michael W. Fleming

cc: Joseph O. Kahl (by email)  
Paula Foley (by email)  
Service List (by email)